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**Dominion**

SEP 26 2001

September 12, 2001

Mr. Lake H. Barrett  
Acting Director  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
Washington, D.C. 20585

Dear Mr. Barrett:

Your letter to Mr. Tom Capps of August 27, 2001, requested comments regarding the adequacy of Yucca Mountain to serve as a permanent repository for spent nuclear fuel and high-level radioactive waste.

Dominion operates North Anna Units 1 and 2, Surry Units 1 and 2, and Millstone Units 2 and 3. We also own Millstone Unit 1 which has been permanently closed. Since 1983, Dominion and the previous owner of Millstone Power Station have paid more than \$707 million into the Nuclear Waste Fund. The Millstone units also have an obligation of over \$245 million which will remain unpaid until DOE begins taking fuel away from those plants. The DOE remains legally and contractually obligated to take delivery of Dominion spent fuel. This delivery was to have commenced by January 1998, but DOE still has not begun to meet its obligation.

The Dominion staff has examined the recently issued Preliminary Site Suitability Evaluation or PSSE. Based on this report, Dominion strongly supports the approval of Yucca Mountain as the site of the nation's permanent spent nuclear fuel and high-level radioactive waste repository. We urge the Secretary of Energy to recommend the site to the President for development of the repository.

We believe there are no compelling reasons not to proceed with the preparation of the licensing application for Yucca Mountain's development into a repository. If the President recommends the site for licensing or Congress passes override legislation, the PSSE and all other associated information developed and aggregated over the past 20 years should now facilitate a successful licensing effort.

The Department of Energy must now vigorously pursue the licensing, construction, and operation of the facility so that commercial nuclear power plants nation-wide can have spent fuel removed in a timely fashion. Such removal would allow our plants to operate without the threat of premature shutdown brought about by the failure of the government to remove spent fuel from our plant sites in accordance with the law and our contracts. This would help assure the long-term viability of our nation's electrical supply.

I look forward to observing continued progress toward the operation of Yucca Mountain.

Sincerely,



David A. Christian  
Senior Vice-President Nuclear Operations  
and Chief Nuclear Officer

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